



Kate E. Janukowicz  
Director

Gibbons P.C.  
One Gateway Center  
Newark, NJ 07102-5310  
Direct: 973-596-4913 Fax: 973-639-8325  
kjanukowicz@gibbonslaw.com

February 23, 2021

**VIA ECF & ELECTRONIC MAIL**

Hon. Lois H. Goodman, U.S.M.J.  
United States District Court  
Clarkson S. Fisher Bldg.  
& U.S. Courthouse  
402 East State Street, Room 2020  
Trenton, NJ 08608  
Email: [lhg\\_orders@njd.uscourts.gov](mailto:lhg_orders@njd.uscourts.gov)

**Re: In re VALEANT PHARMACEUTICALS INTERNATIONAL, INC.  
SECURITIES LITIGATION, No. 3:15-cv-07658 (MAS) (LHG)**

---

Dear Judge Goodman:

We represent Defendants ValueAct Capital Management L.P., VA Partners I, LLC, ValueAct Holdings, L.P., ValueAct Capital Master Fund, L.P., ValueAct Co-Invest Master Fund, L.P., and Jeffrey W. Ubben (together, the "ValueAct Defendants"). We respectfully submit this letter under Local Civil Rule 101.1(c)(5) to request that the Court grant the withdrawal of Margaret L. Carter of O'Melveny & Myers LLP ("O'Melveny") as *pro hac vice* counsel for the ValueAct Defendants, and that Ms. Carter be removed from the Court's service list for purposes of receiving notification of electronic filings in this matter. Ms. Carter was admitted *pro hac vice* by this Court's October 23, 2018 order (Dkt. No. 374). O'Melveny, and the O'Melveny attorneys other than Ms. Carter who have made appearances in this matter on behalf of the ValueAct Defendants, remain counsel for the ValueAct Defendants.

We respectfully request that Your Honor "so order" this letter, pursuant to L. Civ. R. 101.1(c)(5). Thank you for the Court's consideration of this withdrawal request.

Sincerely,

s/ Kate E. Janukowicz  
Kate E. Janukowicz

cc: All Counsel of Record (via ECF)

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2021

\_\_\_\_\_  
Hon. Lois H. Goodman, U.S.M.J.